

UNITED STATES FEDERAL COMMUNICATIONS COMMISSION

In Re Applications of:) WT DOCKET No.: 02-28

ALEE CELLULAR COMMUNICATIONS) File No.: 11025-CL-P672-A-89
)

For Authorization To Construct)
Nonwireless Cellular System)
in Texas RSA 21 Market 672A)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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ALEE CELLULAR COMMUNICATIONS) File No.: 11025-CL-P672-A-89
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Nonwireless Cellular System)
in Texas RSA 21 Market 672A)

Courtroom TW-363
Federal Communications
Commission
445 12th Street S.W.
Washington, D.C.

Thursday,
October 24, 2002

The parties met, pursuant to notice of the
Commission, at 9:00 a.m.

BEFORE: HONORABLE ARTHUR I. STEINBERG
Administrative Law Judge

APPEARANCES:

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I N D E X

VOIR

| <u>WITNESSES:</u> | <u>DIRECT</u> | <u>CROSS</u> | <u>REDIRECT</u> | <u>RECROSS</u> | <u>DIRE</u> |
|-------------------|---------------|--------------|-----------------|----------------|-------------|
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|----------------|--|--|-----|-----|--|
| Terry H. Jones | | | 478 | 481 | |
|----------------|--|--|-----|-----|--|

482

483

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|---------------------|-----|-----|--|--|--|
| Robert A. Bernstein | 485 | 493 | | | |
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Hearing Began: 9:00 a.m. Hearing Ended: 3:45 p.m.

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|----|----------------------------|------------------------|-----------------|-----------------|
| 1 | | <u>E X H I B I T S</u> | | |
| 2 | | <u>IDENTIFIED</u> | <u>RECEIVED</u> | <u>REJECTED</u> |
| 3 | <u>Alee Cellular:</u> | | | |
| 4 | Alee- 6 | 477 | 481 | |
| 5 | Alee-7 | 471 | 481 | |
| 6 | Alee-2 | 487 | 493 | |
| 7 | | | | |
| 8 | <u>Enforcement Bureau:</u> | | | |
| 9 | EB-12 | 513 | 514 | |
| 10 | EB-28 | 555 | -- | |
| 11 | EB-29 | 557 | -- | |
| 12 | EB-24 | 580 | 580 | |
| 13 | EB-25 | 584 | 584 | |
| 14 | EB-13 | Prev | 617 | |
| 15 | EB-15 | 618 | -- | |
| 16 | EB-18 | 624 | 624 | |
| 17 | EB-19 | Prev | 639 | |
| 18 | | | | |
| 19 | <u>Intervenor:</u> | | | |
| 20 | I-6 | prev. | 631 | |
| 21 | I-7 | prev. | 633 | |
| 22 | | | | |
| 23 | | | | |
| 24 | | | | |
| 25 | | | | |

P R O C E E D I N G S

(9:00 a.m.)

JUDGE STEINBERG: We are on the record now, and I see Mr. Jones is back in the witness stand. Mr. Hill, do you have redirect?

MR. HILL: I do. **If** I could hand this to you, Your Honor, I ask that a one-page document, legal size, at the top captioned Alee Cellular Communications Partnership Contribution Analysis with a 12/31/98 date be identified as Alee Exhibit 6. I have given the court reporter two copies of that.

JUDGE STEINBERG: Okay. The document described will be marked for identification as Alee Exhibit No. 6.

(The document referred to was marked for identification as Alee Exhibit 6.)

MR. HILL: I also ask that a one-page document with the heading in script Capital Call No. 12 be identified as Alee Exhibit 7. I have given the court reporter two copies of that document.

JUDGE STEINBERG: Okay. The document described will be marked for identification as Alee Exhibit No. 7.

(The document referred to ~~was~~ marked for identification as Alee Exhibit 7.)

1 Whereupon,

2 TERRY H. JONES

3 having been previously duly sworn, was called as a
4 witness and was examined and testified as follows:

5 REDIRECT EXAMINATION

6 BY MR. HILL:

7 Q Mr. Jones, do you have what's been marked as Alee
8 Exhibit 6 in front of you?

9 A I do, sir.

10 Q Do you recognize that documents?

11 A Yes, sir. It is the calculation of the change of
12 ownership interest.

13 Q Did you prepare it, or was it prepared under your
14 supervision?

15 A Yes, sir, it was.

16 Q Can you tell us from that document how many
17 partnership interest recalculations there had been for the
18 Alee partners?

19 A Yes, sir. There was one that took place after
20 capital call number 12, and there was another one which took
21 place after capital call number 14.

22 Q Were these two recalculations the only
23 recalculations of partnership interest pursuant to the
24 provisions of the partnership agreement?

25 A Yes, sir.

1 Q Looking at the first recalculation, you say that
2 occurred after capital call 12?

3 A Yes, sir.

4 Q Would you look at what's been identified as Alee
5 Exhibit 7.

6 A Yes, sir.

7 Q Do you recognize that?

8 A Yes, sir. That is a record of the capital calls
9 as they were sent and received.

10 Q Is this from your records?

11 A Yes, sir, it is.

12 Q Looking at that document, can you tell us when
13 capital call number 12 was made?

14 A On October 9, 1992, the capital call was sent out.

15 MR. DeJESUS: Can you repeat that, please?

16 THE WITNESS: October 9, 1992.

17 BY MR. HILL:

18 Q Based upon the October 1992 date for capital call
19 number 12, can you give me the time line for the first
20 recalculation?

21 A The capital calls are sent out. There is a 30 day
22 window in which to return. It was common practice at that
23 time to send out a second notice for those who hadn't paid
24 in an attempt to raise all of the funds available. So that
25 would have closed sometime in 1993.

1 Q Can you give us a more precise window for the
2 closing in 1993?

3 A Based upon some of the transactions that *see*
4 here, we received a contribution towards the end of January
5 '93.

6 JUDGE STEINBERG: That's Mr. Macannoni (phonetic)
7 right?

8 THE WITNESS: Yes, sir.

9 BY MR. HILL:

10 Q Then when would the first recalculations have been
11 reflected on the records of the partnership?

12 A Not until sometime between the first and second
13 quarter of 1993.

14 MR. HILL: I have no further questions. I told
15 you if you let us go at 4:00 we would be precise this
16 morning.

17 JUDGE STEINBERG: Do you want to move the Exhibits
18 6 and 7?

19 MR. HILL: Thank you, Your Honor. I do want to
20 move the introduction of Exhibit No. 6.

21 JUDGE STEINBERG: Any objections?

22 MR. DeJESUS: No objections.

23 MR. EVANS: No objections.

24 JUDGE STEINBERG: Alee Exhibit 6 is received.

25 //

1 (The document referred to,
2 previously identified as Alee
3 Exhibit No. 6, was received in
4 evidence.)

5 MR. HILL: Your Honor, I now move the introduction
6 of Alee Number 7.

7 JUDGE STEINBERG: Any objections?

8 MR. DeJESUS: No, Your Honor.

9 MR. EVANS: No objections.

10 JUDGE STEINBERG: Alee Exhibit 7 is received.

11 (The document referred to,
12 previously identified as Alee
13 Exhibit No. 7, was received in
14 evidence.)

15 JUDGE STEINBERG: Any re-cross?

16 MR. DeJESUS: Yes, Your Honor.

17 RE-CROSS-EXAMINATION

18 BY MR. DeJESUS:

19 Q With capital call number 14, when was the date
20 that that capital call was made?

21 A That capital call was made approximately October
22 1995.

23 Q Do you also have an exhibit that would also
24 indicate the percentage, the break down, as well? Was that
25 prepared?

1 A For '95?

2 Q Yes.

3 A I don't have that with me, sir. It would have
4 been in my records.

5 Q Were these documents provided to us via discovery?

6 A Yes, sir, they were.

7 Q Okay. With reference to the October 1995 capital
8 call, do you have a comparable listing concerning the
9 breakdown that you prepared?

10 A I'm sure there is in those records.

11 MR. DeJESUS: No further questions, Your Honor.

12 RE-CROSS-EXAMINATION (CONT'D)

13 BY MR. EVANS:

14 Q Mr. Jones, on Alee Exhibit 6 about half way down
15 the page, there's reference to two percent transfer of
16 ownership from Bunis to Cellular Dream.

17 A Yes.

18 Q I take it from your testimony, you're not calling
19 that a recalculation of interest?

20 A No, sir.

21 Q But there was, in fact, a change in Mr. Bunis'
22 ownership interest, right?

23 A Yes, sir.

24 Q That occurred sometime in 1991 or 1992?

25 A Based upon the document that I have here, it would

1 have had to have occurred before October ninth of '92.

2 Q Right.

3 MR. EVANS: Thank you. Nothing further.

4 JUDGE STEINBERG: Could you give me the dates
5 again for that, please?

6 THE WITNESS: For which one, sir?

7 JUDGE STEINBERG: The Bunis thing. It was just
8 your answer.

9 THE WITNESS: Sometime before the October 9, 1992.

10 JUDGE STEINBERG: But you are not sure how far
11 before?

12 THE WITNESS: I'm not sure of that date.

13 JUDGE STEINBERG: Okay.

14 MR. EVANS: Can I just ask one further question

15 FURTHER RE-CROSS-EXAMINATION

16 BY MR. EVANS:

17 Q Over the breaks, did you have an opportunity to go
18 back and look at the K-1's for the partnership?

19 A The K-1's?

20 Q Yes.

21 A Yes. I believe I had those sent down to me, yes.

22 Q Okay. Did you **look** at the K-1 for 1992?

23 A I believe I had that K-1 sent to me, yes.

24 Q Did it show that there had been any changes in the
25 partnership interest as of the end of 1992?

1 A I don't recall whether that was in '32 or in '93
2 that I saw the change take place.

3 Q Well, based on your testimony this morning, the
4 K-1 for 1992 should not have shown any changes in the
5 partnership interest, right?

6 A That's correct.

7 Q Other than Mr. Bunis'?

8 A That would be correct if that would have occurred
9 prior to then, yes.

10 Q When you looked at the K-1 last night, right?

11 A The 1333 K-1's reflect the percentages as
12 reflected on the recalculations.

13 Q What about the 1992?

14 A They do not reflect the changes as a result of the
15 recalculations.

16 Q Are you sure?

17 A Yes.

18 Q Okay because a moment ago you weren't sure.

19 A A moment ago I thought you were asking a different
20 question, sir.

21 Q All right.

22 MR. EVANS: Nothing further.

23 JUDGE STEINBERG: Okay. Mr. Jones, you are
24 excused. Thank you very much for coming and testifying.
25 Have a nice trip back to Pennsylvania.

1 THE WITNESS: It was a pleasure visiting your
2 city.

3 JUDGE STEINBERG: You have to come back soon.
4 (Witness excused.)

5 MR. HILL: Could we have a five minute break?

6 JUDGE STEINBERG: Yes. Off the record.
7 (Whereupon, a short recess was taken.)

8 JUDGE STEINBERG: Back on the record. Mr.
9 Bernstein, could you please stand and raise your right hand?

10 THE WITNESS: Yes.

11 Whereupon,

12 ROBERT A. BERNSTEIN

13 having been duly sworn, was called as a witness
14 and was examined and testified as follows:

15 DIRECT EXAMINATION

16 BY MR. HILL:

17 Q Mr. Bernstein, would you please state your full
18 name for the address -- record, please?

19 A Yes. My name is Robert Bernstein, 10 Persimmon
20 Way, Springfield, New Jersey.

21 Q Thank you.

22 MR. HILL: Your Honor, Mr. Bernstein is a
23 diabetic.

24 JUDGE STEINBERG: When you tell me when you need a
25 break, we will take a break. If you want to eat, eat. I do

1 not care.

2 THE WITNESS: All right. Thank you.

3 MR. HILL: Thank you.

4 JUDGE STEINBERG: I see you have a cookie.

5 THE WITNESS: I have my kit there. I think if we
6 just take a break in an hour and-a-half, that will be fine.

7 JUDGE STEINBERG: I hope it's before that. But if
8 you get dizzy, if you get nauseous, if you get sweaty, just
9 let me know.

10 THE WITNESS: Okay. Thanks, Your Honor.

11 JUDGE STEINBERG: Those are the symptoms, right?

12 THE WITNESS: All kinds, but that's fine, yes.

13 JUDGE STEINBERG: Okay. Or any other.

14 MR. HILL: All right. Thank you.

15 THE WITNESS: I'm sure I'll be fine.

16 JUDGE STEINBERG: Just let me know.

17 MR. HILL: Your Honor, I ask that the written
18 direct testimony of Robert Bernstein consisting of 6 pages
19 be identified as Alee Exhibit No. 2.

20 JUDGE STEINBERG: Okay. Like the other ones, we
21 are not counting the declaration page.

22 MR. HILL: Correct. I have given the court
23 reporter two copies of Exhibit No. 2.

24 JUDGE STEINBERG: The document described will be
25 marked for identification as Alee Exhibit 2.

1 (The document referred to was
2 marked for identification as
3 Alee Exhibit No. 2.)

4 BY MR. HILL:

5 Q Mr. Bernstein, do you have Exhibit 2 in front of
6 you?

7 A Just a moment.

8 Q Do you have it in front of you?

9 A No, I don't. I mean -- are you talking about my
10 direct testimony?

11 Q Yes.

12 A I left it in the witness room. You told me to
13 bring it. I'm sorry.

14 JUDGE STEINBERG: Okay. We'll go off the record
15 while you are doing that.

16 (Whereupon, a short recess was taken.)

17 JUDGE STEINBERG: Back on the record.

18 BY MR. HILL:

19 Q Mr. Bernstein, do you now have Exhibit 2 in front
20 of you?

21 A Yes.

22 Q Was that prepared under your supervision?

23 A Yes, it was.

24 Q Are there any corrections?

25 A No.

1 Q Is it true and correct to the best of your
2 knowledge?

3 A Yes, it is.

4 MR. HILL: I move the introduction of Exhibit 2.

5 JUDGE STEINBERG: Any objections?

6 MS. LANCASTER: I have just a couple of
7 objections, Your Honor. On page 4, line 16, I would like to
8 voir dire the witness regarding that first statement right
9 there.

10 JUDGE STEINBERG: Okay.

11 VOIR DIRE

12 BY MS. LANCASTER:

13 Q Mr. Bernstein, hi, I'm Judy Lancaster. Hopefully
14 you recall me from your deposition.

15 A Yes, I do.

16 Q When you say you didn't sign it knowing it was
17 false or misleading, you understand that there was a
18 specific finding on this very issue in the Algrex case,
19 don't you?

20 A I'm very much aware of that, but I was -- that it
21 was found that I knowingly and intentionally signed a false
22 statement, I am very much aware of that.

23 Q Look up on first line of this page also. You said
24 when you signed the application, you were acting in an
25 ministerial role?

1 A Yes.

2 Q Explain to me what the basis of that statement --

3 MR. HILL: Your Honor, I think we've gone into
4 cross-examination.

5 MS. LANCASTER: Well, I

6 JUDGE STEINBERG: Well, we are in the course of
7 voir dire. Let's -- it kind of doesn't matter

8 MS. LANCASTER: Well, Your Honor, I don't believe
9 that --

10 JUDGE STEINBERG: Okay.

11 MS. LANCASTER: -- asking him what he means by
12 ministerial is cross --

13 JUDGE STEINBERG: That's cross.

14 MS. LANCASTER: -- cross examination. I want to
15 know the basis for his using that word.

16 JUDGE STEINBERG: That's cross. It does not
17 matter. Whether you ask it now or later, you are going to
18 ask it.

19 MS. LANCASTER: So can he answer it?

20 JUDGE STEINBERG: Yes. He may as well answer it
21 as long as it is on everybody's mind.

22 THE WITNESS: I was given things to sign. I was
23 told *that* somebody needed to sign on behalf of the
24 partnership, and Allan Kane wanted me to sign because he
25 said he'd always know where I was. He was my father-in-law,

1 and he said there are things that have to be signed quickly,
2 and filings that have to be done quickly, and he said I just
3 need somebody to sign this. I want it to be you Bob.

4 BY MS. LANCASTER:

5 Q By using the word "ministerial," do you mean to
6 imply that you had no responsibility for the truthfulness of
7 the materials that were in the document you were signing?

8 A I realize now that I should have been doing
9 independent verification. I signed it in a ministerial
10 manner. I was told this was prepared by counsel and it
11 needs to be signed, and it needs to be gotten out. I didn't
12 compare things with lists or -- I was stupid, okay. But
13 that's -- yes, it was signed in a ministerial way.

14 Q So the answer to my question is yes?

15 A Yes what? I'm sorry.

16 Q I said when you signed this, are you trying to
17 imply that you had no responsibility for the truthfulness of
18 the document you were signing?

19 A I had responsibility. I signed it, and there was
20 a statement there and I signed it.

21 Q Okay. I want to move on to page 6, line 8, the
22 sentence that begins "in point of fact."

23 MS. LANCASTER: Your Honor, I would ask that that
24 sentence be stricken. It's irrelevant and it's hearsay.

25 MR. HILL: Well, for the purpose that it's being

1 proffered, I don't think we're -- no objection.

2 JUDGE STEINBERG: Okay. The sentence beginning on
3 page 6, line 8, "in point of fact," going through line 10,
4 "New Mexico" is stricken.

5 MS. LANCASTER: I have no further questions, Your
6 Honor. I would ask that the word "ministerial" at line 2 on
7 page 4 be stricken.

8 JUDGE STEINBERG: I'll overrule that.

9 MR. EVANS: I have no further questions for cross,
10 Your Honor.

11 JUDGE STEINBERG: Mr. Evans, any objections to
12 Exhibit 2?

13 MR. EVANS: No.

14 JUDGE STEINBERG: Mr. Quianzon?

15 MR. QUIANZON: Good morning, Your Honor. We would
16 ask that the entirety of page 4 and the first four sentences
17 on page 5 which comprise the answer to a question at the end
18 of page 3, so the entirety of page 4 and the first four
19 lines of page 5 be stricken for re-litigating the matters
20 that were handled in Alqreg.

21 MR. HILL: The same position that we've had with
22 respect to the earlier.

23 JUDGE STEINBERG: Okay. This is going to be the
24 same ruling. Objection is overruled for the same reasons it
25 was in the other exhibits.

1 MR. QUIANZON: For the same reasons, we believe
2 that on page 5 beginning half way through line 10, that was
3 the basis for the adverse finding in the Algreq proceeding,
4 should be stricken, in part, because it's re-litigation and
5 also, in part, because it draws a legal conclusion. The
6 basis for the adverse findings in the Algreq proceeding did
7 not involve the letter amendment but rather Mr. Bernstein's
8 character.

9 JUDGE STEINBERG: The objection will be overruled,
10 and I'm not going to take any legal conclusion that's stated
11 in an indirect case as a legal conclusion. If Mr. Hill
12 wants to argue in his findings that something is based upon
13 this, then you can reply appropriately. So the objection is
14 overruled.

15 MR. QUIANZON: On page 6, line 3, the entirety of
16 the sentence that begins, "the misconduct occurred,"
17 continuing onto line 4. Again, it's a re-litigation of the
18 findings of the Algreq proceeding.

19 JUDGE STEINBERG: Same ruling. Overruled.

20 MR. QUIANZON: And finally on that same page 6,
21 the sentence which begins on line 14 and ends on 16
22 beginning with, "furthermore, in 1990 it was Alee.'" Again,
23 we believe this to be a re-litigation in *which* the hearing
24 designation order --

25 JUDGE STEINBERG: Overruled. I am not going to

1 get that serious weight as I said the other day. I
2 understand your arguments, and I cannot say that they are
3 entirely incorrect, but I think for the reasons I said the
4 other day, I'll leave it in there to show the witness'
5 current state of mind which may be helpful to the people
6 arguing that Alee hasn't been rehabilitated. So the
7 objection is overruled.

8 MR. QUIANZON: We understand, Your Honor, thank
9 you. No more objections.

10 JUDGE STEINBERG: Okay. Alee Exhibit 2 is
11 received.

12 (The document referred to,
13 previously identified as Alee
14 Exhibit No. 2, was received in
15 evidence.)

16 JUDGE STEINBERG: Okay. The little chime I guess
17 means Ms. Lancaster starts, right?

18 MS. LANCASTER: I'm sorry, Your Honor. I cannot
19 control this computer unfortunately.

20 CROSS-EXAMINATION

21 BY MS. LANCASTER:

22 Q Good morning, Mr. Bernstein. How are you?

23 A Good morning.

24 Q I want to go through your background a little bit
25 to start off. My understanding is that you're a lawyer, is

1 that correct?

2 A Yes, that's correct.

3 Q And that you've practiced law for approximately 33
4 years, is that correct?

5 A Yes. Yes.

6 Q What type of practice do you currently have?

7 A Estate planning, and I do corporate work.

8 Q What type of corporate work?

9 A Basically real estate work, commercial
10 transactions, loans, mortgages, purchases of buildings,
11 houses. I do both commercial and residential.

12 Q In the past, have you done other types of legal
13 work?

14 A I have to a very limited extent when I first
15 started out.

16 Q What other types?

17 A I've done municipal court work. I've handled one
18 or two divorces. I would think that would be it. I've
19 never done personal injury work. I've been involved in some
20 litigation in probate matters.

21 Q Do you bankruptcy at all?

22 A No, not at all.

23 Q So in the course of your work history, you have
24 had occasion to work with numbers and financial documents,
25 that sort of thing?

1 A To a very limited extent. When dealing with
2 probate, I would -- there'd be an accounting, but I'm not
3 used to dealing with, like, an accountant's financial
4 statement. No. I don't do a --

5 Q Would you consider the type of work you do to be
6 -- do you deal with lots of paperwork?

7 A Yes. It's mostly transactional work, paper work,
8 wills, trusts, things like that.

9 Q In order to do the work well, you would need to be
10 analytical?

11 A Yes. Yes, I would.

12 Q You would have to pay attention to detail, is that
13 correct?

14 A Yes, I would.

15 Q It's very detail oriented work, in fact, isn't it?

16 A Yes, it is.

17 Q You have to have some type of financial expertise,
18 don't you?

19 A I'm not sure what you mean by financial expertise.

20 Q Well, you're working with, I think you said,
21 mortgages, real estate documents.

22 A Yes.

23 Q Frequently they involve -- and particularly
24 commercial transactions involve -- money transactions, don't
25 they?

1 A Yes. They're money transactions, but in other
2 words, I'm not involved in calculations or anything like
3 that. A mortgage may be \$100,000, and there's all
4 supporting documents, affidavits, and so on, but it doesn't
5 go into numbers.

6 Q Would you not have to figure out the amount of
7 filing fees and real estate taxes and things like that, no?

8 A Yes. The filing fees, yes, although I'm generally
9 not directly involved, yes, we -- as part of the
10 transaction, I may have the secretary look up what's the
11 filing fee; there's so many pages. We compute what the
12 filing fee is. It's nothing sophisticated.

13 Q Okay. During the course of your 33 years as a
14 lawyer, I'm assuming you have acquired some type of
15 expertise interpreting legal language.

16 A Yes.

17 Q You've learned to interpret statutory law, is that
18 correct?

19 A Yes, I have.

20 Q Case law?

21 A Yes.

22 Q You've drafted pleadings?

23 A In the past, in the early -- yes. It was part of
24 my --

25 Q You drafted -- I'm sorry. I didn't mean to cut

1 you off. Go ahead.

2 A Yes, in the early part of my practice, yes.

3 Q You've drafted contracts?

4 A Yes.

5 Q I believe in association with Alee, you frequently
6 drafted leases, is that correct?

7 A I reviewed and revised leases. There was never an
8 occasion where I drafted a lease, but I have in my own
9 practice drafted leases.

10 Q Have you also as part of your work for Alee sent
11 drafts of documents, contracts, pleadings, whatever, to
12 Alee's counsel for their consideration?

13 A I'm sorry. I didn't quite -- I believe -- what
14 did you say? I'm sorry.

15 Q I said have you drafted legal documents on behalf
16 of Alee, drafted drafts of them, and sent them to Alee's
17 legal counsel for their use and consideration?

18 A Yes. In other words, something might come in and
19 I'd have a comment, and I would draft a revision or
20 something like that, yes, yes.

21 Q In fact, have you done that with regard to the
22 various litigations that Alee has been involved in?

23 A If there was a document that pertained to me, an
24 affidavit or something like that, I would review it. I
25 would suggest revisions if it was my document in the

1 litigation. I didn't review anybody else's or.

2 Q So your testimony is you'd never just done a rough
3 draft and sent it to the attorney of any contract, for
4 example, document and sent it to an Alee attorney and said
5 how about this as the draft, you know, or here's my initial
6 draft; look it over and tell me what you think, that sort of
7 thing. You've never done that?

8 A I can't recall any contract in Alee where we were
9 the initial parties drafting it.

10 Q How about a pleading that was filed on behalf of
11 Alee?

12 A That I would draft an original pleading? I can't
13 recall any.

14 Q How about a filing with the FCC?

15 A I can't recall. I mean, the --

16 Q Okay. Do you have any interest or have you ever
17 had any interest in any other FCC license other than the
18 licenses in the name of Alee?

19 A No, I have not.

20 Q I believe that you became involved with Alee
21 through Allan Kane, is that correct?

22 A Yes, that is correct.

23 Q He was your father-in-law at the time?

24 A Yes.

25 Q How did Allan Kane become Alee's manager?

1 A He was -- we voted upon at that first meeting in
December in 1988.

3 Q Did you vote for him?

4 A Yes.

5 Q You trusted him at that time?

6 A Yes.

7 Q Do you still trust him?

8 A No.

9 Q When did you stop trusting him?

10 A Well, the more we got into this litigation and the
11 more I started to see things which I was unaware of and in
12 particular what I focus on was there was that letter that
13 had my name on. It was addressed to me by Bill Franklin
14 only it was sent to Allan Kane's address

15 Q Now, you're talking about a letter that was
16 presented as an exhibit in the Algreg hearing, is that
17 correct?

18 A Yes. I saw it at a deposition

19 Q Okay, so up until that time, you still trusted
20 Allan Kane?

21 A I would say yes. I was unaware that he had
22 deceived me.

23 Q Okay. How about Mr. Sullivan? Who was Mr
24 Sullivan?

25 A I don't know Mr. Sullivan.